

1 **MENDIOLA\_J.dep**

2 LEONARDO M. RAPADAS  
United States Attorney  
3 JESSICA F. CRUZ  
Assistant U.S. Attorney  
4 MIKEL W. SCHWAB  
Assistant U.S. Attorney  
5 Sirena Plaza, Suite 500  
108 Hernan Cortez Avenue  
6 Hagåtña, Guam 96910-5059  
TEL: (671) 472-7332  
7 FAX: (671) 472-7334

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN MARIANA ISLANDS

10 UNITED STATES OF AMERICA,  
11 Plaintiff,

12 vs.

13 JOEY JUNIOR MENDIOLA,  
14 Defendant.  
15

CRIMINAL CASE NO. 02-00006

NOTICE OF INTENTION TO TAKE  
ORAL DEPOSITION WITH  
SUBPOENA DUCES TECUM

16 TO: Joey Junior Mendiola  
17 P.O. Box XXXXXX  
18 Saipan, MP 96950

19 Please take notice that the United States of America, the plaintiff and judgment creditor  
20 herein, will on May 21, 2008 take oral deposition of defendant, JOEY JUNIOR MENDIOLA, in  
21 the above styled and number case pursuant to Rules 30 and 69(a) of the Federal Rules of Civil  
22 Procedure and in aid of collecting its judgment.

23 Said deposition will take place at the offices of the United States Attorney, 3<sup>rd</sup> Floor,  
24 Horiguchi Building, Garapan, Saipan, MP at 11:00 a.m. on May 21, 2008 and will continue until  
25 completed. Said deposition will be taken before a Certified Court Reporter and will be taken  
26 upon oral examination for the purpose of discovery or as evidence or both pursuant to the  
27 Federal Rules of Civil Procedure.

28 //

1 Notice is hereby further given that at this deposition defendant, JOEY JUNIOR  
2 MENDIOLA, is hereby required to produce all documents described in the accompanying  
3 Schedule A.

4 DATED, this 7<sup>th</sup> day of March, 2008.

5  
6 LEONARDO M. RAPADAS  
United States Attorney  
7 Districts of Guam and the NMI

8  
9 By: /s/ Jessica F. Cruz  
JESSICA F. CRUZ  
Assistant U.S. Attorney  
10 Jessica.F.Cruz@usdoj.gov  
MIKEL W. SCHWAB  
11 Assistant U.S. Attorney  
mikel.schwab@usdoj.gov  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

SCHEDULE A TO NOTICE OF INTENT TO TAKE  
ORAL DEPOSITION WITH SUBPOENA DUCES TECUM

1. Full and complete copies of your income tax returns for the past three (3) years filed by you or any business in which you owned an interest, or evidence of request to CNMI Revenue and Taxation for filing of extension.
2. Earnings statements from your twelve (12) most recent pay checks.
3. Business records for the present year and past calendar or tax year which reflects assets, liabilities, contingent liabilities, gross receipts and expenses for any sole proprietorship, partnership or corporation in which you or your spouse owns any interest.
4. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions where any sole proprietorship, partnership or corporation in which you or your spouse owns any interest has an account of any kind.
5. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions where you or your spouse have an account of any kind.
6. All trust agreements in which you or your spouse are named settlor, trustee, or beneficiary.
7. All deeds, leases, contracts, and other documents evidencing encumbrances of any kind on real property owned by you or in which you or your spouse have any ownership interest.
8. All deeds of trusts, mortgages, or other documents evidencing encumbrances of any kind on real property owned by you or in which you or your spouse have any ownership interest.
9. A listing of all stock, bonds, or other securities of any class you own separately or jointly with others, including options to purchase any securities and the actual instruments if in your possession.
10. Current brokerage statements for the past twelve (12) months from any stock brokerage firm or similar entity where you or your spouse have an account of any kind.
11. Title to any motor vehicle owned by you or your spouse.
12. All life insurance policies in which you are either the insured or the beneficiary.
13. All promissory notes held by you, and all other documents evidencing any money owed to you either now or in the future.
14. All financial statements prepared by or for you in the last twelve (12) months and an updated verified Department of Justice financial statement (OBD 500) not more than sixty (60) days old (attached hereto).
15. All deeds, titles, bills of sale, or other documents prepared in connection with any transfer of real or personal property made with you, either by gift, sale, or otherwise in the last twelve (12) months.
16. A schedule of all regular expenses paid by you, such as installment debts, food, utilities, etc. Include the amount paid, the payee, and, if an installment debt, the amount of the debt owing and any security pledged.
17. All documents evidencing any interest you have in any pension plan, retirement fund, or profit sharing plan.
18. A certified copy of any divorce decree granted to you, plus a copy of any property settlement resulting from said divorce, including alimony and child support agreements or orders.

**Perez, Michelle (USAGU)**

---

**From:** ecf-nmid@nmid.uscourts.gov  
**Sent:** Monday, March 10, 2008 4:33 PM  
**To:** ecf-nmid@nmid.uscourts.gov  
**Subject:** Activity in Case 1:02-cr-00006 United States of America v. Mendiola Notice (Other)

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

**U.S. District Court**

**Northern Mariana Islands**

**Notice of Electronic Filing**

The following transaction was entered by Cruz, Jessica on 3/10/2008 at 4:33 PM GMT+10 and filed on 3/10/2008

**Case Name:** United States of America v. Mendiola  
**Case Number:** 1:02-cr-6  
**Filer:** United States of America  
**Document Number:** 36

**Docket Text:**

**NOTICE of Intention to Take Oral Deposition with Subpoena Duces Tecum by United States of America as to Joey Junior Mendiola (Cruz, Jessica)**

**1:02-cr-6-1 Notice has been electronically mailed to:**

Jessica F. Cruz [Jessica.F.Cruz@usdoj.gov](mailto:Jessica.F.Cruz@usdoj.gov), [marie.chenery@usdoj.gov](mailto:marie.chenery@usdoj.gov), [Michelle.Perez@usdoj.gov](mailto:Michelle.Perez@usdoj.gov), [mikel.schwab@usdoj.gov](mailto:mikel.schwab@usdoj.gov), [usagu.docket@usdoj.gov](mailto:usagu.docket@usdoj.gov)

G. Anthony Long [logalaw@gmail.com](mailto:logalaw@gmail.com), [alison@nmilaw.com](mailto:alison@nmilaw.com), [gal@nmilaw.com](mailto:gal@nmilaw.com), [kelleybutcher@gmail.com](mailto:kelleybutcher@gmail.com), [kmb@nmilaw.com](mailto:kmb@nmilaw.com), [reception@nmilaw.com](mailto:reception@nmilaw.com)

**1:02-cr-6-1 Notice will be delivered by other means to:**

Patrick J. Smith  
United States Attorney Office  
Assistant US Attorney  
P.O. Box 500377  
Saipan, MP 96950-

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1107461626 [Date=3/10/2008] [FileNumber=29091-0]  
[4ac8f0cf9928ba38948597c3fabf4f5597e85f860a34e373baba0909af16aecdd77be0  
559b87a8a15a9b65214bd5729e9cc9315b60b2c624b77007e84800888dd]]